

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CRIMINAL NO. _____
	)	
vs.	)	
	)	
DANIEL LEE JACQUEZ,	)	No. 15-CR-1515 RB
TOBY CHAPIN PADILLA,	)	
JUDAH GRANDE MONDELLO,	)	
ERIC JAMES RUIZ,	)	
GILBERT J. MORENO,	)	
a.k.a. "Gibby,"	)	
ANTHONY R. DAVILA,	)	
a.k.a. "Weasel,"	)	
GARY LEE ROMERO, JR.,	)	
CRYSTAL MEDINA GOMEZ,	)	
KEVIN R. CARTER, and	)	
FREDDY J. LUCERO,	)	
	)	
Defendants.	)	

**UNOPPOSED MOTION TO CONTINUE TRIAL AND PRE-TRIAL DEADLINES**

The United States respectfully moves the Court for a 120 day continuance of the trial date and all pre-trial deadlines in this matter. As grounds therefore, the government states as follows:

1. Pursuant to 18 U.S.C. § 3161(h)(7)(A), this case was designated as complex on May 26, 2015. Doc. 104. Accordingly, the time between the entry of that Order and the trial date is excluded for the purposes of the Speedy Trial Act computation.

2. This case was recently reassigned to undersigned counsel for the government. New counsel for Defendant Kevin R. Carter was also recently appointed. The government has disclosed 676 pages of preliminary discovery consisting only of the wiretap pleadings. Voluminous additional discovery has been provided to the defendants, including line sheets, transcripts, audio recordings of calls, search warrants, surveillance reports, arrest and seizure

reports, laboratory reports, other audio recordings, and voluminous investigatory reports over the course of the investigation. Given the voluminous discovery in this case, counsel for the government and Defendant Kevin R. Carter need additional time to review the discovery and prepare for trial.

3. Trial is currently set for February 29, 2016. Doc. 165. Counsel for the government is currently scheduled for trial regarding two other matters in February 2016, *United States v. Brillet Perales, et al.* (15-CR-1414 RB) and *United States v. Yolanda Gonzales* (15-CR-3686 KG). No further continuances will be granted in *United States v. Brillet Perales, et al.* (15-CR-1414 RB). Counsel for the government is also currently scheduled for trial in *United States v. Pawan Kumar Jain* (14-CR-01261 RB) in April 2016.

4. The government received a request for additional discovery on November 25, 2015, and is working diligently to locate and disclose the requested materials.

5. Counsel for the government contacted all counsel for all defendants still pending trial. There is no objection to the motion.

For the reasons discussed about, the government respectfully requests a 120 continuance of the trial and all pre-trial deadlines.

Respectfully submitted,

DAMON P. MARTINEZ  
United States Attorney

**Electronically filed 12/22/2015**  
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I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification to defense counsel of record.

/s/

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ANNA R. WRIGHT  
Special Assistant U.S. Attorney